

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR,
Plaintiff

Vs.

CASE NO.: 1:25-CV-00251

CRAIG DONAIS, RUSSELL HILLIARD,
DONAIS LAW OFFICES PLLC,
And MARY K. DONAIS,
Defendants

**DEFENDANTS CRAIG S. DONAIS, MARY K. DONAIS AND DONAIS LAW OFFICES
PLLC'S MOTION TO DISMISS**

NOW COME Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC (the "Donais Defendants"), by their attorneys, and hereby request that this Honorable Court dismiss all claims against them pursuant to Fed. R. Civ. P. 12(b)(6) and Fed. R. Civ. P. 8 on the grounds that (a) Plaintiff's claims are entirely time-barred, (b) all statements by or on behalf of Donais are absolutely privileged, (c) Plaintiff has entirely failed to allege sufficient facts to state a cause of action against Mary Donais, (d) each count separately fails to state a cause of action, as outlined below, and (e) the complaint fails to comply with Rule 8, inasmuch as it is not a short and concise pleading.

In support of this motion, the Donais Defendants rely upon their Memorandum in Support of this Motion to Dismiss, filed herewith, and the following two exhibits:

Exhibit A: June 3, 2024 Plaintiff's Notice of Voluntary Dismissal without Prejudice pursuant to F.R.C.P. 41(a)(1)(A)(i) in 1:23-CV-00374-JL-TSM, Doc. 234.

Exhibit B: December 9, 2021 order in the matter of Stewart v. Ang et al, Docket No. 216-2019-CV-00305

WHEREFORE, Craig S. Donais, Mary K. Donais, and Donais Law Offices PLLC request that this Honorable Court dismiss all claims against them.

Respectfully submitted,

FOR THE DEFENDANTS,
CRAIG DONAIS, DONAIS LAW OFFICES
PLLC and MARY K. DONAIS

/s/ Linda M. Smith

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing to all parties in this action by serving same via electronic mail to:

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Date: July 8, 2025

/s/ Linda M. Smith

Linda M. Smith